

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

EQUIFAX INFORMATION SERVICES LLC,

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS FL INC.,  
f/k/a LEXISNEXIS RISK & INFORMATION  
ANALYTICS GROUP, INC.,

Defendant.

CIVIL ACTION NO. 3:10cv609

DONNA K. SOUTTER and TONY L. WEBB,  
for themselves and on behalf of all similarly  
situated individuals,

Plaintiffs,

v.

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

CIVIL ACTION NO. 3:10cv00107(REP)

**EQUIFAX INFORMATION SERVICES LLC's  
MOTION TO CONSOLIDATE AND SUPPORTING BRIEF**

Pursuant to Federal Rule of Civil Procedure 42, Equifax Information Services LLC ("Equifax") respectfully moves the Court to consolidate the captioned cases on the grounds that (1) these cases involve common questions of fact and law and (2) consolidation of these cases will further the goal of judicial economy and avoid the possibility of inconsistent adjudications of common factual issues. The factual and legal basis for this Motion are set forth in detail in a supporting Brief filed concurrently herewith.

This 8<sup>th</sup> day of September, 2010.

/s/

John W. Montgomery, Jr.

Virginia State Bar No. 37149

**Counsel for Equifax Information Services LLC**

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**CERTIFICATE**

I hereby certify that on the 8<sup>th</sup> day of September, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties.

/s/

John W. Montgomery, Jr.  
Virginia State Bar No. 37149  
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